

# **EXHIBIT 2**

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

Melissa Baily (Bar No. 237649)

3 melissabaily@quinnemanuel.com

Lindsay Cooper (Bar No. 287125)

4 lindsaycooper@quinnemanuel.com

5 50 California Street, 22nd Floor

San Francisco, California 94111-4788

6 Telephone: (415) 875-6600

7 Facsimile: (415) 875-6700

8 Attorneys for GOOGLE LLC

9 **UNITED STATES DISTRICT COURT**

10 **NORTHERN DISTRICT OF CALIFORNIA**

11 **SAN FRANCISCO DIVISION**

12 GOOGLE LLC,

13 Plaintiff

14 v.

15 SONOS, INC.,

16 Defendant.

CASE NO. 3:20-cv-06754-WHA

**GOOGLE LLC'S PRELIMINARY CLAIM  
CONSTRUCTIONS AND EVIDENCE  
PURSUANT TO PATENT LOCAL RULE  
4-2**

**U.S. Patent No. 9,967,615 (“the ’615 patent”)**

Claim Term	Proposed By	Google Proposed Construction	Specification and Prosecution History	Extrinsic Support
“local playback queue on the particular playback device” (Claims 13, 20-21, 25)	Google	A data structure stored within the particular playback device that maintains an ordered list of two or more multimedia items for playback in the listed order	’615 patent, 12:31-67; 16:20-31; 16:52-62; 16:62-17:4; Figs. 4, 7, 9-11.	<ul style="list-style-type: none"> <li>Google may introduce expert testimony from Dr. Kyriakakis regarding the ordinary meaning of this term to a person of ordinary skill in the art in the context of the intrinsic record, including the opinion that Google’s proposed construction is consistent with that meaning.</li> <li>Sonos 2014 provisional application 62/007,906</li> <li>U.S. Patent No. 9,674,587 e.g. at 2:52-67, 14:4-16:47, Fig. 4</li> <li>Microsoft Computer Dictionary, 5th Edition (2002)</li> </ul> <p><b>queue</b><sup>1</sup> <i>n.</i> A multi-element data structure from which (by strict definition) elements can be removed only in the same order in which they were inserted; that is, it follows a first in, first out (FIFO) constraint. There are also several types of queues in which removal is based on factors other than order of insertion—for example, some priority value assigned to each element. <i>See also</i> deque, element (definition 1). <i>Compare</i> stack.</p> <ul style="list-style-type: none"> <li>Webster’s New World Telecom Dictionary (2008)</li> </ul>